

USDC - BALTIMORE
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**ADAM MICHAEL NETTINA,

Defendant.**

CRIMINAL NO.

GLR 23cr 134

**(Threats Transmitted by Interstate
Communication, 18 U.S.C. § 875(c);
Forfeiture, 18 U.S.C. § 981(a)(1)(C), 21
U.S.C. § 853(p), 28 U.S.C. § 2461(c))**

INDICTMENT

The Grand Jury for the District of Maryland charges that:

INTRODUCTION

1. On or about March 27, 2023, a school shooting in Nashville, Tennessee, resulted in the deaths of three elementary school children and three adults.
2. In the aftermath of the shooting, news outlets reported that the shooter in Tennessee identified as transgender.

COUNT ONE

On or about March 28, 2023, in the District of Maryland and elsewhere, the defendant,

ADAM MICHAEL NETTINA,

knowingly and willfully transmitted in interstate commerce a communication containing a threat to injure the person of another, for the purpose of issuing a threat, and with the knowledge that the communication would be viewed as a threat, that is, NETTINA, while located in the State of Maryland, placed a phone call from his cellular phone to the office of a lesbian, gay, bisexual, transgender, and queer (LGBTQ) advocacy group and political lobbying organization based in Washington, D.C., leaving a voicemail that included the following language:

You guys going to shoot up our schools now? Is that how it's going to be? You just gonna to kill little kids. You're just going to slaughter fucking little kids. Let

me tell you something, we're waiting, we're waiting. And if you want a war, we'll have a war. And we'll fucking slaughter you back. We'll cut your throats. We'll put a bullet in your head. We're not going to give a fuck. You started this bullshit. You're going to kill us? We're going to kill you ten times more in full.

18 U.S.C. § 875(c)

SPECIAL FINDING

The Grand Jury further alleges that **ADAM MICHAEL NETTINA** intentionally selected the victims of his threat because of the actual and perceived gender, gender identity, and sexual orientation of the people who work at and are assisted by the LGBTQ advocacy group and political lobbying organization based in Washington, D.C.

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. of Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 981(a)(1)(C), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c) as a result of the defendant's conviction under Count One of this Indictment.

2. Upon conviction of the offense in Count One of this Indictment, the defendant,

ADAM MICHAEL NETTINA,

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

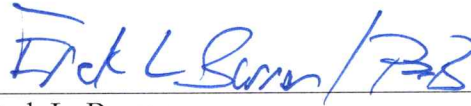
Substitute Assets

3. If the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

Handwritten signature of Erik L. Barron in blue ink, followed by a horizontal line.

Erik L. Barron
United States Attorney

Handwritten signature of Kristen M. Clarke in blue ink, followed by a horizontal line.

Kristen M. Clarke
Assistant Attorney General

A TRUE BILL

SIGNATURE REDACTED

Foreperson

Date: April 12, 2023